

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street, 10th Floor
New York, NY 10007

Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

April 4, 2025

By ECF

Hon. Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

It is the Court's standard practice to mark
peremptory strike forms as court exhibits and file
them under seal at the close of trial; that standard
practice will be followed in this case.

**Re: United States v. Shymell Ephron
24-Cr-418 (MMG)**

Dated: 4/4/2025



Dear Judge Garnett:

We write to request that the Court docket the parties' respective peremptory challenge lists as a sealed court's exhibit for purposes of appeal. Since it is the movant's obligation to establish a record for purposes of a *Batson* challenge, should Mr. Ephron be convicted, we want to ensure that the Second Circuit has a clear understanding of which prospective jurors each party exercised peremptory strikes against.

Sincerely,
/s/
Hannah McCrea
Amy Gallicchio
Michael Arthus
212-417-8700

cc. (by ECF): AUSAs Ryan Allison, Lisa Daniels, and Andrew Jones